

Message

From: Tracy Curtis [Tracy.Curtis@erg.com]
Sent: 8/24/2018 1:13:20 PM
To: Fairchild, Susan [Fairchild.Susan@epa.gov]; Ayres, Sara [Ayres.Sara@epa.gov]
CC: Jennifer O'Neil [Jennifer.O'Neil@erg.com]
Subject: RE: Input Requested Re: Upcoming ICRs

Just a heads up on Semiconductors – David Isaacs of SIA has some questions about what sources are still considered major sources under “once in always” in. Apparently one of the facilities subject to BBBBB as a major source is an older Kodak fab that is now minor, but was once under common ownership with a major source, and he thinks they would no longer be subject. I would expect that he will be giving you a call, Susan, to confirm how that change in policy is being applied.

Thanks,

Tracy R. Curtis
Eastern Research Group, Inc.
919-468-7901

From: Fairchild, Susan <Fairchild.Susan@epa.gov>
Sent: Thursday, August 23, 2018 2:23 PM
To: Ayres, Sara <Ayres.Sara@epa.gov>; Tracy Curtis <Tracy.Curtis@erg.com>
Cc: Jennifer O'Neil <Jennifer.O'Neil@erg.com>
Subject: RE: Input Requested Re: Upcoming ICRs

Both of these numbers look reasonable to me, and I don't have any indication that there are new facilities built in the US in either source category.

Susan Fairchild

Senior Environmental Scientist | US Environmental Protection Agency | Office of Air Quality Planning and Standards | Minerals and Manufacturing Group | Mail Code D 243-04 | Research Triangle Park, NC 27711 | (919) 541-5167

From: Ayres, Sara
Sent: Thursday, August 23, 2018 2:20 PM
To: Tracy Curtis <Tracy.curtis@erg.com>
Cc: Jennifer O'Neil <Jennifer.O'Neil@erg.com>; Fairchild, Susan <Fairchild.Susan@epa.gov>
Subject: RE: Input Requested Re: Upcoming ICRs

I don't have any information on changes to the size of the source categories for either of these rules. I've copied Susan Fairchild who is the OAQPS contact for both rules as she may know if we have any recent data. Thanks.

Sara Ayres
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ayres.sara@epa.gov
(312) 353-6266

From: Tracy Curtis [<mailto:Tracy.Curtis@erg.com>]
Sent: Thursday, August 23, 2018 1:12 PM
To: Ayres, Sara <Ayres.Sara@epa.gov>
Cc: Jennifer O'Neil <Jennifer.ONeil@erg.com>
Subject: Input Requested Re: Upcoming ICRs

Hi Sara,

We have two upcoming ICR renewals (expiring 3/2019) for which you are listed as the MAMPD lead. I wanted to touch base with you on whether you knew of any updates to the inventories for these. These rules haven't had any changes in the past 3 years, and we know of no other rulemaking activity at OAQPS, so I am simply reaching out to see if MAMPD has any knowledge of updates to the # of respondents.

- 1) NESHAP for Refractory Products Manufacturing (40 CFR Part 63, Subpart SSSSS) (Renewal) (OMB No. 2060-0515, ICR No. 2040.06): According to the prior ICR (attached), there are an estimated 8 respondents, and no additional respondents were anticipated to become subject to the standard over the prior three years.
- 2) NESHAP for Semiconductor Manufacturing (40 CFR part 63, Subpart BBBB)(Renewal) (OMB No. 2060-0519, ICR No. 2042.07): According to the prior ICR, there are an estimated 127 facilities, with no new or reconstructed facilities becoming subject to these standards over the next 3 years.

Do you have any information to confirm that these assumptions are reasonable to carry forward, or are you able to identify whether there are any additional respondents or any new respondents anticipated over the next three years? We have also reached out to trade organizations for both of these NESHAP.

Thanks for any assistance you can provide!

Regards,
Tracy

Tracy R. Curtis | Senior Environmental Scientist | ERG | 1600 Perimeter Park Drive, Morrisville, NC 27560 | 919-468-7901